

11:26:56

1 whatsoever about it?

11:26:57

2 A. It's not that I don't have any recollection

11:27:01

3 about it. This was a -- a very hurtful experience,

11:27:06

4 demoralizing, and I can think of other names for it.

11:27:09

5 So, no, ma'am, I did not dwell on those specific

11:27:13

6 statements mostly that were untrue. So, no, ma'am,

11:27:17

7 I -- I don't remember them.

11:27:17

8 Q. Well, what was untrue?

11:27:19

9 A. I don't remember them. I just said that.

11:27:21

10 Q. You just remember that whatever it was, it

11:27:24

11 wasn't true?

11:27:24

12 A. I just remember -- I just know that I had to

11:27:30

13 get over that. I had to move on. I did not dwell on

11:27:34

14 that to memorize it. I don't --

11:27:37

15 Q. I'm not asking you if you memorized it. I'm

11:27:40

16 asking if you remember one single thing that was

11:27:43

17 supposedly drawn up on you.

11:27:44

18 A. I don't want to say the wrong thing. That's

11:27:47

19 why I'm not saying one single thing, ma'am. If I say

11:27:50

20 something that's not correct from memory, then I've

11:27:52

21 told a lie. So I'm not saying anything.

11:27:54

22 Q. No, no, no. Let me -- let me assure you that

11:27:56

23 that's not the case. You get the opportunity once this

11:28:00

24 is done to look at it --

11:28:01

25 A. Well, see, even if I look at it after it's done

11:28:05

1 and I've said something, you know, I've still lied.

2 Q. If it's --

11:28:06

3 A. And if I don't remember those things, I can't

11:28:08

4 correct it.

11:28:08

5 Q. No, you do get a chance to correct it.

11:28:10

6 A. I can't correct it if I don't remember it. I

11:28:12

7 can't recall it, though.

8 Q. Okay.

11:28:16

9 A. I can't correct it.

11:28:17

10 Q. Okay. So you -- basically, what you're saying

11:28:19

11 is that you don't remember any infractions that the

11:28:21

12 district drew up on you? You think something serious

11:28:24

13 happened, but you can't remember?

11:28:25

14 A. The problem is that I can't state anything

11:28:30

15 because it's not in my mind and I'm not going to even

11:28:35

16 attempt to.

17 Q. Okay.

11:28:35

18 A. That's what the problem is.

11:28:39

19 Q. Okay. What other teachers that were white

11:28:42

20 females were treated different because you are a black

11:28:45

21 female, which is what this says here?

11:28:49

22 A. I think I wrote three names down and there are

11:28:53

23 several others.

11:28:54

24 Q. Where did you write three names down?

11:28:56

25 A. On the interrogatories that were sent to us.

11:29:01

1 Q. Okay.

11:29:05

2 A. I think I wrote Joyce Sweet, Staci Decuir, and
3 Kim Melendez.

11:29:20

11:29:20

4 Q. And they were treated differently than you?

11:29:23

5 They're not African-American females?

11:29:25

6 A. That's right.

11:29:27

7 Q. Okay. How were they treated differently?

11:29:34

8 A. The only -- I'm thinking about another question

11:29:47

9 that you asked. And I'm trying to think of the names

11:29:51

10 that I need to give you. There were five names that I

11:29:57

11 gave you. And I apologize for that.

11:29:59

12 Q. That's okay.

11:30:01

13 A. It should be Anita Croft, Kimberly, I think,

11:30:13

14 Byers. I think her first name is Kimberly. Kathleen

11:30:24

15 Strapkovic. There were two other names. I can't think

11:30:30

16 of them now.

11:30:31

17 Q. Well, if we -- if we -- if you recall them, if

11:30:35

18 you'll just let me know, we'll kind of put it -- put it

11:30:39

19 right in there. And my question was, how were they

11:30:42

20 treated differently from you?

11:30:43

21 A. Anita and Kathy were the other -- the teacher

11:30:46

22 and the teacher assistant in content mastery. I spoke

11:30:51

23 about them earlier. And what was the other name that I

11:30:54

24 gave you?

11:30:54

25 Q. Kimberly Dyers or Byers?

11:30:58

1 A. She was one of the teachers who worked with the
2 story -- well, went along with the story that those two
3 were telling Ms. Ruffin about the content mastery
4 center and the ACE. And -- but they remained in their
5 positions and they were not retaliated against or
6 anything like that. And like I said, there are two
7 other names that I just can't think of right now.

11:31:39

8 Q. Okay. So I guess -- I guess my question is,
9 how -- how were they treated differently? You just --
10 you said that they were not retaliated against or --

11:31:43

11:31:46

11:31:49

11 A. Well, Ms. Ruffin listened to them.

11:31:52

12 Q. Okay.

11:31:52

11:31:58

13 A. Ms. Ruffin did not want to hear what I was
14 telling her. And after I placed those internet
15 forms -- the information, rather, from the internet in
16 teachers' boxes, she still didn't want to listen to me.
17 She listened to them and she went on with putting in
18 place -- she went before the faculty to say that all
19 the failures would come to those classrooms, all the
20 resource, all the co-teach, the STAT students,
21 etcetera, etcetera. She went on with that plan.

11:32:03

11:32:07

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11:32:18

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11:32:32

22 Q. And all those students would go into
23 Ms. Croft's classroom?

11:32:33

24 A. Into both classrooms.

11:32:36

25 Q. Ms. Croft's and Ms. --

11:32:39

1 A. And mine.

11:32:39

2 Q. And yours?

11:32:40

3 A. Uh-huh.

11:32:41

4 Q. So, basically, all the failing students would
5 come into y'all's classrooms?

11:32:44

11:32:45

6 A. The failing co-teach, resource, STATS,
7 etcetera, those would come into those two classrooms.

11:32:50

11:32:54

8 Q. Did they make for a hard teaching environment?

11:32:58

9 A. It was impossible because there was no space
10 for all of those students.

11:33:01

11:33:04

11 Q. So did this decision create you having to have
12 a lot more students?

11:33:09

11:33:13

13 A. Of course.

11:33:14

14 Q. What was the effect of that decision, meaning
15 what was your day then like?

11:33:18

11:33:21

16 A. Well, to be honest with you, after a few

11:33:26

17 months, she rescinded on that order and she had to

11:33:30

18 change it because -- to be honest with you, I don't

11:33:33

19 know why, but she had to change that decision.

11:33:36

20 Q. You don't know why?

11:33:37

21 A. I don't know why.

11:33:45

22 Q. Okay. And that happened two or three months

11:33:47

23 after you said, "I don't think this should happen" to

11:33:51

24 her?

11:33:53

25 A. I don't recall exactly when it happened. I --

11:33:55

1 I think it was the beginning of that school year -- I
2 mean, not the beginning of that school year, the first
3 part of 2002, I think. I'm not sure.

11:34:01

11:34:08

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11:35:01

11:35:05

11:35:09

11:35:09

11:35:12

4 Q. Okay. And, again, I just want to be clear.
5 You didn't complain to the district about any of that,
6 did you?

7 A. I complained to Ms. Ruffin, like I said
8 earlier.

9 Q. Okay. And did you say to Ms. Ruffin, "You're
10 doing this because, you know" --

11 A. I don't know what my exact words were.

12 Q. You don't?

13 A. (Witness shaking head negatively.)

14 Q. Okay. So when you say that you were treated
15 differently from white females, who treated you
16 different?

17 A. Ms. Ruffin.

18 Q. Anybody else?

19 A. No. Just those that she -- I don't know how to
20 say it. It was basically Ms. Ruffin.

21 Q. Anybody else?

22 A. What do you mean when you say "else"? Explain
23 that.

24 Q. Well, you said here that you were treated
25 different than white females because you are a black

11:35:14

1 female and I wanted to know who treated you different.

11:35:20

2 A. She used her assistant principals to carry out

11:35:24

3 her -- her programs of retaliation, if that's what

11:35:27

4 you're asking me.

11:35:28

5 Q. So who are you referring to?

11:35:31

6 A. I think one of the names in this suit is Mollye

11:35:37

7 Williams.

11:35:37

8 Q. And who is Mollye Williams?

11:35:42

9 A. Assistant principal.

11:35:43

10 Q. And how did she treat you differently?

11:35:46

11 A. The markdowns that's part of those appraisals

11:35:53

12 and --

11:35:55

13 Q. And you feel like she did that because you're a

11:35:58

14 black female?

11:36:03

15 A. I don't know why she did it, ma'am, as far as

11:36:05

16 that is concerned. But I -- I can't say it's just

11:36:11

17 because I'm a black female. She was doing what she was

11:36:14

18 directed to do.

11:36:20

19 Q. By -- by Ms. Ruffin?

11:36:22

20 A. Exactly.

11:36:23

21 Q. Anybody else?

11:36:25

22 A. Any -- what do you mean by anybody else?

11:36:27

23 Q. Was she being directed by anybody else to treat

11:36:30

24 you in a certain way?

11:36:32

25 A. I don't know.